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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LUCIA SLOAN, on behalf of herself and
those similarly situated persons,

Plaintiffs,

vs.

LADAH LAW FIRM PLLC, and RAMZY
LADAH, an individual,

Defendants.

Case No.: 2:19-cv-01343-JAD-VCF

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANTS' MOTION TO
DISMISS/MOTION TO COMPEL
ARBITRATION AT ECF NO. 6**

(FIRST REQUEST)

ORDER

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to response to Defendants' Motion to Dismiss/Compel Arbitration at ECF No. 6 from the current due date of Thursday, October 2019, through and including Friday, November 15, 2019. This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

Plaintiff's counsel has two motion replies due on October 31, 2019, the same day as the current deadline in this matter. Plaintiff's counsel has/is experiencing a heavy workload including,

1 but not limited to, drafting a Ninth Circuit Reply Brief, preparing and taking three depositions,
2 drafting three sets of initial disclosures, drafting a Nevada Supreme Court Settlement Brief,
3 responding to discovery requests, numerous client meetings, preparing two clients for deposition,
4 and depositions scheduled, drafting a Nevada Supreme Court settlement conference brief, drafting an
5 Early Neutral Evaluation brief, court appearances and numerous client meetings. In addition,
6 Nevada Day occurred within the time period for which Plaintiff's counsel had family plans, as well
7 as having a more than half-day personal appointment that could not be rescheduled without having to
8 wait several more months for another.

10 Defense counsel requested that the response deadline be moved until November 15, 2019 to
11 best accommodate his schedule and heavy workload so he will have adequate time to prepare
12 Defendants' reply.

14 This stipulation to extend the deadline is made in good faith and not the purposes of delay.

15 Respectfully submitted the 29th day of
16 October, 2019

17 KEMP & KEMP

18 /s/ Victoria L. Neal, Esq.
19 JAMES P. KEMP, ESQ.
20 VICTORIA L. NEAL, ESQ.
KEMP & KEMP

21 Attorneys for Plaintiffs


Respectfully submitted the 29th day of October,
2019

FISHER & PHILLIPS LLP

22 /s/ Scott M. Mahoney, Esq.
23 SCOTT M. MAHONEY, ESQ.
24 FISHER & PHILLIPS LLP

25 Attorney for Defendants

26 **IT IS SO ORDERED:**

27 
28 UNITED STATES DISTRICT JUDGE
Dated: October 30, 2019.